

Q. Have you or not paid the full \$1500.00?

A. We have paid for the place, but we had to borrow from some of Joseph's relatives and they want their money as soon as possible.

Q. If the court does not see fit to declare that this property is solely yours and that your daughter, Evelyn, has a one-half interest in it, do you or not wish the court to authorize and direct you, if possible, to have a mortgage executed on your new home in favor of Evelyn Marie Ferguson for the amount of her interest in the place which you are selling to Mr. Wolfe?

A. Yes. We need the money to pay off on the other place and if the court decides that way, I will appreciate being able to use the money and give a mortgage to Evelyn for it.

Q. Do you or not feel that it would be for the best interests of Evelyn to have her interest in the Oswald place sold to Wolfe?

A. I do because my husband is taking care of Evelyn and me and he made all arrangements to buy this other place and move to it before we knew that I couldn't sell my place without Evelyn's share being taken care of. You see, I always thought the place was mine and that I could sell it and we made all our plans and agreed to buy the other place and agreed to sell this place so we are in an awful spot if we can't use the money to put on the new home. Evelyn has to have some place to live and since I am the only one that ever took care of her, except for what my husband does now and has done, it seems to me that we ought to be able to use her money, even if we have to give the mortgage for it.

Q. I noticed that the new place was deeded to your husband alone. Do you or not plan to have your name put on the deed with his?

A. Yes sir. We figured on that from the start, but Mr. Newcomer, the Register of Wills in Hagerstown, said it would be easier to put this deed in my husband's name and then get it changed later. I think my husband is going to tell you now to fix up the deed so that we will own the place jointly.

Q. Please describe the new place which your husband bought from his mother's heirs.

A. It is a six-room house, about 15 acres of land.

Q. Of what construction is the house?

A. It is a log and weatherboard house.

Q. Is it in good shape?

A. No, it needs some repairs.

Q. Do you feel that \$1500.00 is a fair price for it?

A. Yes.

Q. If the court should decide that one-half of what you get from Mr. Wolfe is Evelyn's, do you feel that a mortgage on this place would be good security for Evelyn's interest?

A. Yes sir, because it is worth at least \$1500.00 and she certainly couldn't get more than \$400.00, so she should be safe.

TO THE GENERAL INTERROGATORY:

Nothing more.

EDWARD D. STORM
ATTORNEY AT LAW
FREDERICK, MARYLAND

Pearl Edna Oswald Williard
Pearl Edna Oswald Williard